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16 UNITED STATES DISTRICT COURT
17 NORTHERN DISTRICT OF CALIFORNIA
18 SAN JOSE DIVISION

19 UNITED STATES OF AMERICA,) CASE NO. 18-CR-00258 EJD
20 Plaintiff,)
21 v.) STIPULATION AND [PROPOSED] ORDER
22 RAMESH BALWANI,) REGARDING CONDITIONS OF RELEASE AND
23 Defendant.) APPEARANCE BOND
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1 **STIPULATION**

2 Following the jury's verdicts on July 7, 2022, the government sought and the Court ordered
3 modifications to the June 15, 2018 Order Setting Conditions of Release and Appearance Bond for the
4 defendant. *See* ECF No. 8. Specifically, the Court increased the amount of the bond to \$750,000 and
5 required that it be secured. The Court ordered further that the defendant must not travel outside the
6 Northern District of California without the approval of Pretrial Services and notice to the government.
7 The parties respectfully request that the Court issue the accompanying Proposed [Order] to memorialize
8 these modifications.

9 **IT IS SO STIPULATED.**

10 DATED: July 14, 2022

Respectfully submitted,

11 STEPHANIE M. HINDS
12 United States Attorney

13 /s/ Robert S. Leach

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15 JEFF SCHENK
16 JOHN C. BOSTIC
17 ROBERT S. LEACH
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20 DATED: July 14, 2022

21 Respectfully submitted,

22 ORRICK HERRINGTON & SUTCLIFFE
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24 /s/ Jeffrey B. Coopersmith

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Attorneys for Defendant
RAMESH BALWANI

[PROPOSED] ORDER

Good cause appearing, the Court's June 15, 2018 Order Setting Conditions of Release and Appearance Bond [ECF No. 8] is modified as follows: The amount of bond is set at \$750,000 and shall be secured by cash or real property. Further, the defendant must not travel outside the Northern District of California without the approval of Pretrial Services and notice to the government.

All other conditions of the June 15, 2018 Order Setting Conditions of Release and Appearance Bond [ECF No. 8] shall remain in effect.

IT IS SO ORDERED.

DATED: July __, 2022

HON. EDWARD J. DAVILA
UNITED STATES DISTRICT JUDGE